UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco, California

January 20, 2012

Sent via Electronic Mail Only

Mr. James Soutter, Equity Office Management
James_Soutter@equityoffice.com

Mr. Greg Gehlen, Google Inc.
Gehlen@google.com

Mr. Vic Cocianni, Schlumberger Technology Corporation
Cocianni-v@slb.com

RE: EPA's Comments on January 3, 2012 revision to Air Monitoring and Soil Sampling Plan for Google-Fairchild Plumbing Excavation Activities, 313 and 323 Fairchild Drive, Mountain View, CA; Middlefield-Ellis-Whisman (MEW) Superfund Study Area

Dear Mr. Soutter, Mr. Gehlen, and Mr. Cocianni:

The U.S. Environmental Protection Agency (EPA) has reviewed the January 3, 2012 revisions to the Air Monitoring and Soil Sampling Plan for Google-Fairchild Plumbing Excavation Activities, 313 and 323 Fairchild Drive, Mountain View, CA, and proposed changes to the Sampling Plan as stated in the January 13, 2012 email from Ms. Pamela Andes to EPA.

Attached are EPA's comments on the Sampling Plan. Please provide EPA with the Revised Sampling Plan addressing EPA's comments and incorporating the proposed changes in Ms. Andes' January 13th email. EPA must be provided 48 hours notice prior to conducting any of the trenching, monitoring, and sampling work, such that EPA can oversee any of the activities, as necessary.

Please contact me at 415.972.3141 or Lee.Alana@epa.gov if you have any questions.

Sincerely,

Alana Lee
Project Manager
Superfund Division

cc: via e-mail only
Brad Smith, Equity Office Management
Pamela L. Andes, Allen Matkins Leck Gamble Mallory & Natsis LLP
Richard C. Coffin, Barg Coffin Lewis & Trapp LLP
Sallie Lim, Google Inc.
John Castagnoli, Devcon Construction
Xavier Alcaraz, EORM

EPA Comments on January 3, 2012 Air Monitoring and Soil Sampling Plan for Google-Fairchild Plumbing Excavation Activities, 313 and 323 Fairchild Drive Mountain View, CA

1. The Sampling Plan should include and reference the 2011 Google and Equity Office Management indoor air data reports and describe how the post-construction indoor air sampling will be compared to these two data sets. At a minimum, some of the same locations must be sampled as part of the post-construction sampling, including any locations where pathway or indoor air TCE levels exceeded outdoor air levels. In addition, the sampling design of the post construction sampling should be revised to include screening for potential pathways and collection of pathway samples based on visual observations during walk-through with EPA.

2. Appendix I - Project Schedule and Organization Chart. The Sampling Plan should be updated to provide the Project Organization of all the Parties involved, including the roles and responsibilities and contact information, and an updated Project Schedule. The schedule should include the proposed indoor and exterior trenching and approximate sampling and walkthrough dates. EPA must be provided advance notice of the work, including a minimum of 48 hours notice prior to conducting any subsurface work, monitoring, and sampling activities, such that EPA may oversee the work, as necessary.

3. A photoionization detector (PID) used for screening for the presence of volatile organics should have the ability to measure in the low (<10) parts per billion by volume to assess for potential pathways.

4. As you may know, in September 2011 EPA finalized the Toxicological Review for Trichloroethylene (TCE) which includes new TCE inhalation toxicity values [see http://www.epa.gov/iris/subst/0199.htm]. EPA Region 9 is currently evaluating and considering a TCE interim short term removal action level of 15 micrograms per cubic meter ($\mu g/m^3$) at the MEW Site for the non-residential/commercial worker scenario. EPA's consideration of this TCE short-term removal action level is based on the new inhalation toxicity values, supporting information in the TCE Toxicity Assessment, and potential short-term exposure (10-hour worker exposure per day).

   In light of this information and as a matter of good construction practice, EPA recommends that you take this interim removal action level into account and that the buildings be maximally ventilated while workers are inside the building and subsurface conduits remain open to ensure that workers are protected from Site contaminants. EPA also recommends that the Sampling Plan include monitoring for TCE in air and contingency measures if the interim removal action level is exceeded while subsurface conduits remain open and there is potential exposure to workers.

5. Appendix H - Quality Assurance Project Plan (QAPP). EPA's December 29, 2011 comments on Appendix H were not addressed. Overall the QAPP is written for soil sampling, and not air sampling. Consider specifying Appendix H as the QAPP for Soil Sampling only and separately reference and adopt 2011 Haley & Aldrich Indoor Air Sampling and Analysis Work Plan, which includes QA/QC in Appendix F, for procedures for air sampling. Note: This Sampling Plan must still include provisions for use of a low pbb PID for screening and identification of potential pathways and for the collection of potential pathway samples.

Other comments that were not addressed in appendices to the Sampling Plan.

- There is not a specification in the Field Sampling Plan for final canister pressure for ambient air (there is for sub-slab).
- The Plan notes field duplicates 1 in 10 but the QAPP incorrectly states 1 in 20 (which is the lab duplicate frequency).
- All the references to sampling handling and preservation are incorrect for air.
- Canister certification should be included.
- Laboratory quality controls are not specified or referenced.
- Laboratories to be used need to be identified. Laboratory SOPs may be requested if EPA is unfamiliar with the laboratory being used.
- The Sampling Plan notes a QA person but there is not one identified in the Project Organization information and should be.